

Thu Oct 26 19:34:39 EDT 2017  
CMS.OEX@epamail.epa.gov  
FW: US Manufacturing concern  
To: "cms.oex@domino.epamail.epa.gov" <cms.oex@domino.epamail.epa.gov>

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**From:** Hope, Brian  
**Sent:** Thursday, October 26, 2017 11:34:39 PM (UTC+00:00) Monrovia, Reykjavik  
**To:** CMS.OEX  
**Subject:** FW: US Manufacturing concern

**From:** Tony Petrucci [mailto:TPetrucci@AngTech.com]  
**Sent:** Thursday, October 26, 2017 11:24 AM  
**To:** Pruitt, Scott <Pruitt.Scott@epa.gov>  
**Cc:** bill coyle <bcoyle@angtech.com>; RAdhikari@angtech.com  
**Subject:** RE: US Manufacturing concern

10/26/17

Dear Mr. Pruitt,

I am sending you an update of information for the concern we are currently addressing with the EPA. (Please see below.) I will continue to update you. Please if you can respond to me directly or have someone from your staff contact me as soon as possible.

We really need your help. Thanks for your help in advance.

Sincerely

Tony Petrucci

President & CEO

### Europium sensitization

<https://www.ncbi.nlm.nih.gov/pubmed/7473067>

[J Environ Pathol Toxicol Oncol.](#) 1995;14(1):1-9.

### Toxicity study of europium chloride in rats.

[Ogawa Y<sup>1</sup>](#), [Suzuki S](#), [Naito K](#), [Saito M](#), [Kamata E](#), [Hirose A](#), [Ono A](#), [Kaneko T](#), [Chiba M](#), [Inaba Y](#), et al.

### [Author information](#)

### Abstract

**EuCl<sub>3</sub>·6H<sub>2</sub>O** was administered by gavage for 28 consecutive days to groups of 10 male and 10 female rats (Slc:Wistar strain) at doses of 0, 40, 200, or 1000 mg/kg/day. Additional groups of male and female rats receiving the 0 and 1000 mg/kg doses were used to assess recovery after 14 days subsequent to cessation of compound administration. Body weights and food consumption were measured, and hematological, clinical biochemistry, and histopathological examination were performed. The concentrations of europium (Eu) and of essential elements in organs were determined by ICP-MS or ICP-AES. In the rats of each sex dosed at 200 and 1000 mg/kg, the body weight gain significantly decreased because of reduction in food consumption. Hyperkeratosis of the forestomach and eosinocyte infiltration of the stomach submucosa were found in both sexes receiving the 1000 mg/kg dose group, suggesting an irritation effect by EuCl<sub>3</sub>·6H<sub>2</sub>O. The Eu levels increased dose dependently in the liver, kidneys, spleen, and femurs, and the accumulated volume of Eu in

these organs was estimated to be about 1/100,000 of the total dosed amount. The administration of  $\text{EuCl}_3 \cdot 6\text{H}_2\text{O}$  increased the serum iron concentration in males and the serum total iron binding capacity in each sex and decreased cholinesterase activity in females in the 1000 mg/kg dosed group. Iron concentrations in the spleen and strontium concentrations in the femurs of rats of both sexes dosed at 1000 mg/kg were significantly decreased. **We concluded that the no-observed-effect level is 200 mg/kg/day. Our investigation demonstrated that elemental analyses of organs is a useful approach to toxicological study.**

**From:** Tony Petrucci [<mailto:TPetrucci@AngTech.com>]  
**Sent:** Friday, October 20, 2017 10:56 AM  
**To:** 'Pruitt.Scott@EPA.gov' <[Pruitt.Scott@EPA.gov](mailto:Pruitt.Scott@EPA.gov)>  
**Cc:** bill coyle ([bcoyle@angtech.com](mailto:bcoyle@angtech.com)) <[bcoyle@angtech.com](mailto:bcoyle@angtech.com)>; [RAdhikari@angtech.com](mailto:RAdhikari@angtech.com)  
**Subject:** US Manufacturing concern

10/19/17

Dear Mr. Pruitt,

First of all congratulations on your new position.

Since March of this year I have made several attempts to contact you via President Trump. Actually I appealed to President Trump before you were confirmed in your current position.

Simply stated, we have a problem with an EPA ruling. It partially has to do with the "Frank R. Lautenberg Chemical Safety for the 21<sup>st</sup> Century Act" and the interpretation of this law by the EPA. As it stands currently it will destroy our manufacturing capability for making a very important security product at our factory in Kentucky and force us to buy something similar from an overseas manufacturer.

I work for a "small" public – but non reporting manufacturing company of UV fluorescent pigments, Angstrom Technologies in Florence Kentucky. We have a total of 15 employees including me (I am the President/CEO). Our products are found in various inks and security documents. I cannot define the exact type of "security documents" because this is not a "secure" email. But let's just say our products are contained in very high value items.

Our product contains europium an element that has been around since 1901 and is used in plastic for lasers, phosphorescence for red or blue in color TV's, quantum memory chips and security documents. The EPA has ruled that this element is now considered a "sensitization" substance. We are currently challenging the EPA ruling. We have been challenging this for nearly a year now.

We have had to pay a consultant to assist us in obtaining an LVE for this product with no success and because of the rejections received from the EPA we have not been able to provide this product to waiting customers.

If there is anyone from your staff who can help us? It would be most appreciated as we are at wits end. Our two PhD Chemists will be available for any meeting including the consultant working with us in addressing the EPA concerns. He is with Scientific & Regulatory Solutions. L.L.C.

Mr. Pruitt, I know you have been an advocate to assist businesses in successfully wading through various government regulations to continue commerce. Our company prides itself on doing things right and ensuring we abide by all environmental requirements.

We are desperate here and really could use help in allowing us to manufacture this product in the United States.

Sincerely,

Tony Petrucci

President & CEO Phone (b) (6)

